

START

DOE/R/L-91-32 Draft B

Comments "Public" 51007
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Fox pedited Response Action Proposal
(EE/CA&EA) for 200 W. Area Carbon
Tetrachloride Plume

- p1 Where is the Summary statement? The NIH (I understand) was recently sued for failing to provide a summary statement of conclusions - I think you may also have a political problem here. It is very poor (unsatisfactory) science to conceal information from the public by making them read this entire article to draw correct conclusions. It is a clue you are wasting our money,
line 2 - how do you define "uncontaminated" soils? Is this "normal soil?

under 1.3 ERA Background

The EPA has deliberately defined contamination levels at health standards levels like in cities. Is it cost effective to require such stringency for isolated areas (other than for political purposes)? I hope to see some common sense applied to non-habited areas. My data, for example, has California regulating citations at below natural levels.

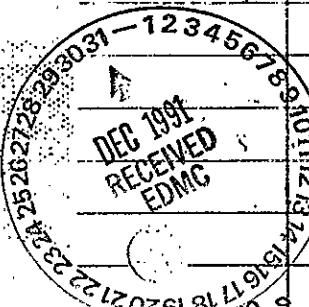
p8 under 2.4 Extent of Contamination line 4 The conventional method of expressing parts per million is PPM, not p/m. You also give only max values (not the more useful average concentrations). Detection is now so low as to be meaningless as far as health hazard.

Last paragraph, 2nd line - the 7,340 parts per billion is equal to ~~7.34~~ parts per million. You are using big numbers to be impressive, I think.

p9 under 2.5 since you are using conceptual models, I assume you don't really know much about the contamination.

p11 under 3.1 have you ever agreed to a scientific no-actionanford Project Office or is this unacceptable? Why the immediacy in a non-habited area? Is this political justification or scientific need?

(over)



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(2)

p 11

under 3.2 last paragraph

You agree that limiting access protects human health
so it is no health problem.

p 13

I hope you will discuss this migration in terms of dilution
to show how low the concentrations become where they are
insignificant. Zero concentration is, of course, not
publicly acceptable because of cost. Draw the common sense
line somewhere.

p 14

last line under 3.3.1.2 Poorly written sentence.
Probably means that the distribution of contamination
makes Freezing or Slurry French/Walls impracticals

p 19

under H.1.1 1st line DNAPL is not defined.

last paragraph, 2nd line - Do you really expect
plutonium and americium to exist in this environment as
metals - you are really reaching for an explanation (very poor).

p 23

under 4.2.2.3 paragraph two - You should be able to obtain data
on natural uranium migration due to steam from oil field work.

p 25

4.3.1 The fact you are breathing is, in fact, an ozone-depleting
process - surely you have better criteria. Sounds amateurish thru
lack of definition. You also contribute to the greenhouse effect.

p 29

under 4.5.3 Although the carbon tetrachloride seems to be
doing absolutely no harm & perhaps only the more productive
wells could be cleaned down to maybe 100 PPM w/o wasting
too much money.

(3)

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under 5.0 - you have already admitted there is no health hazard so the only criteria is the synthetically generated compliance regulations. For the real requirements - see the last sentence on the page, i.e. Best Available Control Technology is really based on opinion and zero levels which aren't reasonable. Needs an individual educated in common sense.

p 35. Table 7 item 2 Regulation sets radiation exposure at 1000 th of yearly natural exposure (much less than an airplane ride to Denver). Purposely set excessively low.

What the Table really demonstrates is extreme overlap of government regulations w/o consistency or simplicity.

p 36. Some Table 8 as for Table 7

p 37. Third paragraph - Detection capability - use of a Chromatograph shows implied need to find at very many factors of 10 below human health hazard and excessive control.

Last paragraph suggest possible cure (in removing natural radon) is more dangerous than the treatment, although I see no real hazard. Are we seeking a cure or wanting to perform a test?

p 38, p 39. I can't see how you arrive at too high carbon tetrachloride vapors in the air assuming that it is underground. Obviously you have no supporting, measured data for this. It must be generated via the SCREEN model. The public will be confused by your assuming vapor concentrations in the air due solely to operation of the clean up system.

p 43. paragraph two - says that the above concentrations were calculated, not measured. See also 1st paragraph - p 47 - no hazard.

p B-43 Carbon tetrachloride vapors at best appear to be 5-15 PPM and on p B-45 appear to be emitted only at low barometric pressure (i.e. under stormy conditions). Per page B-51 soil carbon tetrachloride concentrations are most not detected.

p. after A-8. The Site Evaluation Report of V. J. Rohay & V. G. Johnson, Geosciences Group, W.H.C. appears to accurately portray Hanford Site information. Well-written, honest and non-political.

The rest of this Action Proposal is supporting data. The real justification for doing the work appears to me to be to see if it can be done - not for health hazard nor should it really be justified through excessively designed regulatory requirements. The real summary should be put up front in plain English and not be based on conservative carbon tetrachloride levels. There is enough data to present reasonable averages that describe the real situation.